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7 Attorney for Cameron Lee Thomas

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9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,
12
Plaintiff,
13
v.
14 CAMERON LEE THOMAS,
15
Defendant.

Case No. 2:18-cr-239-RFB-GWF

UNOPPOSED MOTION TO
MODIFY CONDITIONS OF
RELEASE

**(EXPEDITED TREATMENT
REQUESTED)**

16
17 The defendant, Cameron Lee Thomas, by and through his counsel of record,
18 Raquel Lazo, Assistant Federal Public Defender, files this Unopposed Motion to Modify
19 Conditions of Release to modify Mr. Thomas's Lake Mead National Recreation Area
20 (LMNRA). Mr. Thomas requests that he be permitted to travel to LMNRA as required for case
21 investigation as long as he is accompanied by his attorney or other member of the FPD office
22 working on his case.

23 DATED this 15th day of August, 2018.

24 RENE L. VALLADARES
Federal Public Defender

25 By: /s/Raquel Lazo

26 RAQUEL LAZO
Assistant Federal Public Defender
Attorney for Cameron Lee Thomas

1 **POINTS AND AUTHORITIES**

2 1) On February 22, 2018, this court released Mr. Thomas on a personal
3 recognizance bond with conditions. *See* PR Bond (#11). This court restricted Mr. Thomas from
4 LMNRA. *Id.*

5 2) This case stems from alleged conduct that occurred at LMNRA. Defense
6 counsel needs to conduct crime scene investigation at LMNRA. It is critical for Mr. Thomas's
7 defense team to understand exactly what happened and exactly where it happened. Defense
8 counsel would like Mr. Thomas to accompany her to LMNRA so that she can get a better
9 understanding of Mr. Thomas's version of events.

10 3) As such, Mr. Thomas seeks to modify the restriction to permit him to travel to
11 LMNRA as required for case investigation as long as he is accompanied by his attorney or other
12 member of the FPD office working on his case.

13 4) Because defense counsel plans on conducting the investigation early next week,
14 she requests expedited consideration.

15 5) Pretrial Services Officer Samira Barlow has no opposition. Government counsel
16 also has no opposition.

17 Dated this 15th day of August, 2018.

18 Respectfully submitted,

19 RENE L. VALLADARES
20 Federal Public Defender

21 By: /s/Raquel Lazo

22 RAQUEL LAZO
23 Assistant Federal Public Defender
24 Attorney for Cameron Lee Thomas
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1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA
3

4 UNITED STATES OF AMERICA,

5 Plaintiff,

6 v.

7 CAMERON LEE THOMAS,

8 Defendant.
9

Case No. 2:18-cr-239-RFB-GWF

ORDER

10
11 IT IS ORDERED that Defendant Thomas's pretrial release conditions are modified to
12 permit travel to Lake Mead National Recreation Area as required for case investigation as long
13 as he is accompanied by his attorney or other member of the FPD office working on his case.

14 DATED this 16th day of August, 2018.

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18 UNITED STATES MAGISTRATE JUDGE
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That on August 15, 2018, he served an electronic copy of the above and foregoing **UNOPPOSED MOTION TO MODIFY CONDITIONS OF RELEASE (EXPEDITED TREATMENT REQUESTED)** by electronic service (ECF) to the person named below:

/s/ *Brandon Thomas*
Employee of the Federal Public Defender